



CITY OF RICHMOND

WORK PLAN for the COMMUNITY WIDE BROWNFIELDS
ASSESSMENT GRANT – HAZARDOUS and PETROLEUM

CFDA No.: 66.818

Date: 5/25/2018

**Work Plan for the Community Wide Brownfields Assessment Grant
Hazardous Substances and Petroleum
Richmond, Indiana**

Grant Recipient: City of Richmond, Indiana
50 North 5th
Richmond, Indiana 47374

Project Contact: Beth Fields, Director, Department of Infrastructure and Development & City Controller
Telephone: (765) 983-7211
Fax: (765) 962-7024
E-mail: bfields@richmondindiana.gov
Project Period: October 1, 2018 – September 30, 2021

This project supports Environmental Results Objective 1.3: Revitalize Land and Prevent Contamination. Provide better leadership and management to properly clean up contaminated sites to revitalize and return land back to communities. Strategic measures: Assess and Cleanup Brownfields to make more brownfields sites Ready for Anticipated Reuse. Specifically, the recipient will inventory, characterize, assess, plan reuse of brownfields properties and conduct planning and community involvement activities to encourage revitalization and reuse of brownfields sites. Project Period is 3 years.

CFDA: 66.818
CERCLA Authority: 104(k) (2) & (3)
DCN: STX
Budget FY: 18
Appropriation: E4
Budget Org: 0500AG7
Object Class: 4114
Program Results Code (PRC): Hazardous Sub D79 (Action Code: NY);
Petroleum D79XBP (Action Code: OR)

Proposed Outputs and Outcomes:

The primary expected output for the assessment grant will be assessment of brownfields within the City of Richmond, Indiana. The following outputs associated with the assessment grant will be tracked:

- Number of community engagement events held
- Number of brownfield sites identified
- Number of Phase I ESAs completed
- Number of Phase II ESAs completed
- Number of clean-up planning tasks completed

The expected outcomes of the assessment grant activity will include reducing environmental threats to the various brownfields in Richmond. The following outcomes will be tracked for projects supported by the assessment grants:

- Number of sites assessed
- Acreage assessed
- Jobs created/retained
- Sites with completed redevelopment
- Number of parcels/acreage made ready for redevelopment
- Leveraged monies

I. INTRODUCTION

The United States Environmental Protection Agency (USEPA) has awarded the City of Richmond a cooperative agreement (CA) for a community wide brownfields assessment grant. The grant will be used to assess sites contaminated by hazardous substances and petroleum products. The CA funds will be used to identify existing brownfield sites/properties within the city; investigate the historic uses of the properties and identify Recognized Environmental Conditions; determine the type, severity and extent of environmental contamination; develop remedial strategies that will allow for the safe and viable redevelopment/reuse of properties; conduct community outreach events, and develop funding mechanisms to complete cleanup activities and redevelop the sites among other tasks.

Richmond will leverage the CA dollars to support brownfield redevelopment in the city. Successful brownfield redevelopments will enhance the local economy, create local jobs, increase property value and affordable housing stock, and increase tax revenues. Qualified consultants will be used to assist with grant activities, such as Phase I and II Environmental Site Assessments (ESA).

II. MANAGEMENT & COORDINATION

Beth Fields, Director of the Richmond Department of Infrastructure & Development (DID) and City Controller, will serve as the City's Project Manager. Under Ms. Field's supervision, the DID is responsible for preparing, implementing and enforcing plans and regulatory tools that guide future growth, enhancement, and preservation of the city. Ms. Fields will be assisted by Tammy Tidrow, Community Development Specialist & Grant Writer, who has extensive experience managing all grant activities for the City. Beth Fields also serves as the City of Richmond Controller; therefore she will also serve as the Grant Financial Manager, and will be responsible for accounting and financial reporting. She has provided these services on many other grant and loan programs benefiting the City. Ms. Fields will be assisted by Deputy Controller Emily Palmer. DID will complete quarterly reports; annual financial status reports; Assessment, Cleanup and Redevelopment Exchange System (ACRES) updates; and the final close-out summary report to the USEPA Region 5 as required. For each Phase I ESA, DID will complete and submit the All Appropriate Inquiry (AAI) checklist to USEPA. DID will work closely with the selected environmental consultant, EPA, and other city staff as needed to achieve project objectives, maintain budgets and schedules, and prepare plans and reports. Beth Fields will coordinate grant activities with the selected consultant and will serve as liaison with the USEPA, the city, and the public at large through community outreach activities.

III. GRANT TASKS

The schedule detailed in this Work Plan assumes that a CA with the USEPA will be executed by October 1, 2018.

Task 1: Program Management

Hazardous Substances (\$3,150) and Petroleum (\$3,150)

Task 1 activities will be completed throughout the cooperative agreement cycle. The city will prepare a Request for Qualifications (RFQ) and conduct a public solicitation for retaining a qualified environmental consultant to complete the contractual obligations in the tasks outlined herewith. Additionally, the City of Richmond, the EPA, and the selected environmental consultant will frequently correspond regarding project progress and activities. Quarterly reports and other grant documentation, including but not limited to annual reports and MBE/WBE Utilization reports) will be submitted to the EPA throughout the grant cycle per the requirements of the Cooperative Agreement.

TASK 1 ACTIVITIES	DELIVERABLES	COMPLETION DATE
Prepare a Request for Qualifications (RFQ) and conduct public solicitation for retaining a qualified environmental consultant	Statements of Qualifications (SOQ) received from consultants	August 1, 2018
Select a consultant		October 1, 2018
Prepare quarterly reports, ACRES and other documentation	Quarterly reports, ACRES and other documentation	30 days after the end of each quarter (1st quarter – January 30 th ; 2nd quarter – April 30 th ; 3rd quarter – July 30 th ; 4th quarter -October 30 th
Complete Property Profile in ACRES as appropriate	Property Profile Form	On a site-specific basis throughout the grant cycle
Complete ACRES data entry for assessed sites	ACRES data entered	Ongoing throughout the CA period

Task 2: Brownfields Inventory & Prioritization

Hazardous Substances (\$3,500) and Petroleum (\$3,500)

The funds allocated in this task to develop the City's Brownfield Inventory. *Once an environmental consultant is under contract, an initial public meeting will be held to gain public input on properties which may need to be added to the inventory. Public comments will also be used to prioritize the inventoried sites.* Sites will be prioritized and screened against Site Eligibility and Property Ownership Eligibility Criteria as well as redevelopment potential and availability of leveraged funding among others, with public input.

Eligibility determinations will be prepared and submitted to the EPA (hazardous substance sites). IDEM

(petroleum sites) will be provided with sufficient information for the State Agency to generate a petroleum-determination letter, prior to the performance of Phase I ESAs. State petroleum-determination letters will be provided to U.S. EPA, as generated.

TASK 2 ACTIVITIES	DELIVERABLES	COMPLETION DATE
Identify brownfield sites, create a draft inventory, prioritize inventory	List of sites for assessment/investigation consideration	January 15, 2019. Inventory will continue to be revised throughout the CA period.
Site Eligibility Determinations	Eligibility determination requests	First eligibility determination estimated to be requested by January 31, 2019. Ongoing thereafter.

Task 3: Phase I Environmental Site Assessments (ESAs)

Hazardous Substances (\$19,500) and Petroleum (\$19,500)

Phase I Environmental Site Assessments will be performed on key sites throughout the city. Areas of focus will include those already determined in the inventory as high priority sites. The Phase I Assessments will be compliant with All Appropriate Inquiry (AAI) and ASTM E-1527-13. The City of Richmond will contact site owners (of properties not owned by the city), negotiate access agreements, and complete site eligibility determinations prior to beginning site assessment activities. The AAI checklist will also be completed and submitted with each Phase I ESA report. It is estimated that the costs for completing Phase I ESAs costs will average \$3,500 per site depending on the complexity of the property. For planning purposes, the budget assumes approximately 11-16 Phase I ESAs (5-8 each for hazardous substance and petroleum impacted sites). Richmond understands that large sites may need more investment resulting in fewer Phase I ESAs being completed. The ACRES database will be updated when Phase I ESAs are complete.

TASK 3 ACTIVITIES	DELIVERABLES	COMPLETION DATE
Conduct Phase I ESAs	Phase I ESA report	Ongoing throughout the CA period

Task 4: Phase II ESAs

Hazardous Substances (\$103,200) and Petroleum (\$103,200)

A pre-QAPP conference call will be scheduled and conducted with participation by the City, consulting firm and EPA. It is anticipated that the draft QAPP will be submitted within 90 days of the CA. The city understands that costs related to sampling, analysis, and data collection cannot be incurred until the QAPP is approved by the EPA.

Phase II ESAs will be completed to assess recognized environmental conditions identified in the Phase I Assessments. All sampling activities and fieldwork performed during the Phase II Assessments will be

performed in accordance with Indiana Department of Environmental Management (IDEM) guidelines, site-specific Sampling and Analysis Plans (SAPs), and Health and Safety Plans (HSPs) will be submitted for approval by the EPA Project Manager prior to the performance of Phase II Assessment activities. It is estimated that the costs for completing a typical Phase II ESA will range from \$20,000-\$40,000 per investigation depending on the complexity of the sites and the environmental conditions identified in the preceding Phase I ESAs. For planning purposes, the budget assumes approximately 6-10 Phase II ESAs (3-5 each for hazardous substances and petroleum impacted sites). However, as with Task 3, Richmond recognizes that several of high priority sites are large and may require significant grant funding investment. If true, fewer Phase II's may be completed.

TASK 4 ACTIVITIES	DELIVERABLES	COMPLETION DATE
Pre-QAPP conference call and QAPP preparation	Draft QAPP Final QAPP	Draft QAPP submitted to the EPA by 12/15/18
Prepare Sampling and Analysis Plan(s)	SAPs	1 st SAP anticipated 3/1/19 & continuing on a site-specific basis throughout the grant cycle
Prepare Health and Safety Plan(s)	HASPs	1 st HASP anticipated 3/1/19 & continuing on a site-specific basis throughout the grant cycle
Complete Phase II ESA field work	None	On a site-specific basis throughout the grant cycle
Complete Phase II reports	Phase II ESA report	On a site-specific basis throughout the grant cycle

Task 5: Clean-up Planning & Health Monitoring:

Hazardous Substances (\$15,000) and Petroleum (\$15,000)

The City of Richmond will use grant funds to complete Analysis of Brownfield Cleanup Alternatives (ABCAs) and Remedial Action Plans (RAPs), and/or other associated with sites assessed and ready for remediation. In the evaluation of remedial alternatives, the environmental consultant will review known contamination (sources and extents) based on Phase II ESA data and evaluate potential exposure pathways based on the potential future use(s) of the site. This information will be used to establish the cleanup goals for the proposed remediation. RAPs will include a feasibility analysis that evaluates alternatives designed to meet the project objectives. Each alternative will be evaluated for effectiveness, feasibility to implement, and cost. The cleanup method selected will be based on this analysis. Cleanup planning will include an analysis of potential remedial techniques, determination of appropriate cleanup goals, identification of probable costs and planning and application for additional funding. Additionally, funds from this task will be used to obtain Site Status Letters and Comfort Letters from the Indiana Brownfield Program to provide site closure and comfort to prospective brownfield property purchasers

on both contaminated and uncontaminated sites.

Task 5 funds will also be used to develop funding sources necessary to remediate contaminated brownfields and return them to productive reuse. These sources include state and federal funding programs as well as private funding sources such as liability insurance policies identified through insurance archeology. Courts in Indiana have consistently ruled that many general liability policies cover damages resulting from release of petroleum and hazardous materials. Using EPA Assessment Grant funding to establish the presence of contamination will help trigger viable insurance policies to fund further investigation and cleanup of environmental damages. The City of Richmond will make every effort to apply this funding source to all eligible sites. The funding is only limited by insurance policy dollar caps (often \$1M for each year of coverage). This funding has been successfully used on both publicly and privately-owned sites in Indiana. This success will continue with EPA Brownfields Assessment Grant funds by aggressively pursuing insurance funding on all applicable properties where contamination is identified. Often, property owners don't have adequate records of insurance coverage, and insurance archeology (searching for insurance records) is necessary to identify policies. The City will use grant funds to search for these policies to maximize the likelihood of successfully identifying coverage and securing this source of leveraged funds.

TASK 5 ACTIVITIES	DELIVERABLES	COMPLETION DATE
Prepare Remedial Action Plans	Draft RAP(s) Final RAP(s)	First RAP anticipated as early as 6/31/19, then ongoing throughout the CA period
Prepare Analysis of Brownfield Cleanup Alternatives	Draft ABCA(s) Final ABCA(s)	First ABCA anticipated as early as 6/31/19, then ongoing throughout the CA period
Indiana Brownfield Program Site Status Letter and/or Comfort Letter	SSL/CL	First SSL/CL anticipated as early as 6/31/19, then ongoing throughout the CA period
Complete Insurance Archeology	Identify the presence liability insurance coverage on a site	On a site-specific basis throughout the grant cycle

Task 6: Community Outreach & Involvement:

Hazardous Substances (\$5,650) and Petroleum (\$5,650)

Involvement of key stakeholders and the general public is integral for a successful brownfield redevelopment program. Richmond will use funds allocated in this task to take public input on plans and progress of investigation and cleanup activities, and to market sites for future development. The associated costs will fund the preparation and execution of community outreach programs. The selected environmental consultant will work with the City of Richmond to develop outreach materials to be used as a tool to educate stakeholders on the benefits of the grant and how it can be used as a tool to increase

The City may develop a targeted mailing to owners of targeted brownfield properties, inviting them to participate in community engagement and/or educational events where they can learn the value of environmental assessments. Newspaper ads and website updates may be utilized to update the community on brownfield assessment activities and community engagement opportunities. In addition, the city will leverage its social media platforms, earned media and other low-cost, no-cost or in-kind methods to engage the community. The city will hold four to six public meetings throughout the grant period. The selected environmental consultant will assist the city in the public meetings by preparing presentations and providing expertise in informing the public of funding and investigation process. These meetings will be used to inform the community of the progress of the grant activities, gain input on brownfield site prioritization, and develop a dialogue with stakeholders about redevelopment priorities.

TASK 6 ACTIVITIES	DELIVERABLES	COMPLETION DATE
Hold 4-6 community meetings	Meeting minutes, notes, sign-in sheets, and agendas as applicable	Initial public meeting by January 15, 2019, then, ongoing throughout the CA period
Develop support and outreach materials to be distributed at public meetings and other locations/events	Outreach materials, support materials, PowerPoint presentations	November 15, 2018. Updates and additional material may be developed on an ongoing basis.

[illegible]

Country	Percentage of Non-responsive Data
China	~95%
India	~95%
United States	~90%
Germany	~85%
France	~80%
United Kingdom	~75%
Canada	~70%
Australia	~65%
Japan	~60%
South Korea	~55%
Italy	~50%
Spain	~45%
Netherlands	~40%
Belgium	~35%
Sweden	~30%
Norway	~25%
Finland	~20%
Denmark	~15%
Iceland	~10%
Luxembourg	~5%
